

4. Because there was little oversight of Defendant's management, the Defendant caused bank statements for various SLOT financial accounts to be mailed to another SLOT volunteer officer which gave some appearance of controls and regularity to the management of SLOT funds. However, the Defendant knew the statements and papers would be turned over to him so he could conceal them from the leadership of SLOT and continue his embezzlement.

5. In all, the Defendant embezzled approximately \$30,000 to which he was not entitled from SLOT, all the while covering up his defalcation.

6. Between on or about July 1, 2011 and March 31, 2013, with the exact dates unknown, within the Eastern District of Missouri and elsewhere, the Defendant,

JUNSEI ITO,

did devise a scheme and artifice to defraud another out of money and property by means of false and fraudulent pretenses, representations and promises and for the purpose of executing the same did send or cause to be sent material, mail and other matter by means of the United States Postal Service, to wit: statements and other papers related to SLOT financial accounts from Reliance Bank to an address associated with SLOT, both of which lies within the Eastern District of Missouri.

In violation of Title 18, United States Code Section 1341.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

THOMAS C. ALBUS, #46224MO
Assistant United States Attorney